

## **EXHIBIT Y**

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MIC

**MICHAEL MACHAT, ESQ.**  
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*Appearing pro hac vice*  
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Attorneys for Plaintiff

Attorneys for Plaintiff  
**SONJA FELDMAN**

SONIA FELDMAN

**UNITED STATES DISTRICT  
DISTRICT OF NEVADA**

SONIA FELDMAN, } Case Number: 2:24-cv-00526-JCM-MDC  
Plaintiff, }  
v. }  
MARK ANTHONY SAWYER, ET AL, }  
Defendants. }  
PLAINTIFF SONIA FELDMAN'S  
FIRST SET OF REQUESTS FOR  
ADMISSIONS SERVED ON DEFENDANT  
JENNIFER SAWYER

PROPOUNDING PARTY: Plaintiff Sonja Feldman

RESPONDING PARTY: Defendant Jennifer Sawyer

1 RFA Set No: One

2 **PLAINTIFF'S 1ST SET OF REQUESTS FOR ADMISSIONS SERVED ON**  
3 **DEFENDANT JENNIFER SAWYER**

4 Pursuant to Rule 36 of the Federal Rules of Civil Procedure, Plaintiff Sonia Feldman, by  
5 and through her attorneys, hereby serves her 1st Set of Requests for Admissions to Defendant  
6 Mark Anthony Sawyer.

7 **INSTRUCTIONS**

8 If, in responding to this First Set of Requests for Admissions ("Requests"), Responding  
9 Party encounters any ambiguities when construing a Request, Responding Party shall respond to  
10 the best of his, her or its ability and such response shall set forth the matter deemed ambiguous,  
11 and the construction used in responding.

12 **DEFINITIONS**

13 1. "Person(s)" refers to and includes, without limitation and in the singular as well as the  
14 plural, natural persons, attorneys in fact, powers of attorney, partnerships, corporations, limited  
15 liability companies, firms, joint ventures, groups, businesses and other associations, law firms,  
16 estates, trusts, and all other organizations and entities, unless the context specifically indicates  
17 otherwise.

18 2. The terms "related to" and "referring to" or "associated with" means, in whole or in part,  
19 constituting, evidencing, concerning, regarding, containing, embodying, reflecting, describing,  
20 involving, identifying, stating, referring to, dealing with, or in any way pertaining to.

21 3. The term "communications" shall include, without limitation, all letters, emails,  
22 handwritten or typewritten notes, notebooks, sound and/or voice recordings, voicemails, text  
23 messages, instant messages on any messaging platform, transcripts of sound recordings, tapes or  
24 other sound/voice recordings, contracts, agreements, reports, computer records, audio and  
25 videotapes, messages, summaries, and/or any other documentation, however produced or  
26 reproduced, whether sent, received or neither, including the original, draft, copies, and non-  
27 identical copies and the transmittal of such information in any form whatsoever.

- 1       4. The terms "and" or "or" have both conjunctive and disjunctive meanings.
- 2       5. The terms "any" and "all" mean "each" and "every."
- 3       6. The terms "you" and "your" refers to Defendant Jennifer Sawyer.

4

5 **REQUESTS FOR ADMISSIONS:**

6 **Request for Admission No. 1:**

7 Admit that at the time you and your husband Mark Sawyer formed the MJS Nevada Trust you and  
8 your husband were insolvent?

9 **Request for Admission No. 2:**

10 Admit when you formed the MJS Nevada Trust, You and your husband owed more money than  
11 you and he combined had available to pay out to all those who had bridge loans with your husband  
12 if they all asked to withdraw their funds from the program.

13 **Request for Admission No. 3:**

14 Admit that you and your husband set up the MJS Nevada Trust while your husband was running  
15 a Ponzi scheme.

16 **Request for Admission No. 4:**

17 Admit that you and your husband set up the MJS Nevada Trust so you could both hide your assets  
18 from Plaintiff.

19 **Request for Admission No. 5:**

20 Admit that you and your husband set up the Nevada MJS Trust so you both could shield your  
21 assets from Plaintiff in case she sued for the money your husband agreed to pay her.

22 **Request for Admission No. 6:**

23 Admit that during the period from January 29, 2021, when Plaintiff wrote her first check to your  
24 husband, through at least the end of 2021, you were aware your husband was running a Ponzi  
25 scheme and you made no attempt to stop him.

26 **Request for Admission No. 7:**

27 Admit you were benefiting off Plaintiff's monies to fund your lifestyle.

1 **Request for Admission No. 8:**

2 Admit that at the time Plaintiff issued the check for \$1,166,337.13 to your husband, you and he,  
3 as a couple, were insolvent.

4 **Request for Admission No. 9:**

5 Admit that at the time Plaintiff issued a check for \$1,166,337.13 to your husband, you and he were  
6 unable to pay all the debts that you jointly owed.

7 **Request for Admission No. 10:**

8 Admit that instead of using the Plaintiff's check for \$1,166,337.13 to make a bridge loan to others,  
9 your husband instead used that money to partially fund the Vegas Auto Gallery.

10 **Request for Admission No. 11:**

11 Admit that you assisted your husband in his Ponzi scheme.

12 **Request for Admission No. 12:**

13 Admit that you benefited from the \$1,176,337.13 Plaintiff invested with your husband.

14 **Request for Admission No. 13:**

15 Admit you were aware that when your husband told Ms. Feldman he would be able to more than  
16 double her money by using her money in his bridge loan program, it was a lie.

17 **Request for Admission No. 14:**

18 Admit that you knew when your husband promised to treat Plaintiff like his daughter, it was a lie.

19 **Request for Admission No. 15:**

20 Admit that you were aware at all relevant times of your husband's Ponzi scheme and that you did  
21 nothing to prevent it so you could continue to live your lavish lifestyle.

22 **Request for Admission No. 16:**

23 Admit that your husband lied when he promised to treat Plaintiff like his daughter in order to gain  
24 her trust.

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1 **Request for Admission No. 17:**

2 Admit that your husband lied when he promised to treat Plaintiff like his daughter in order to gain  
3 her trust so she would agree to invest over a million dollars into your husband's bridge loan  
4 program.

5 **Request for Admission No. 18:**

6 Admit that you shared with your husband, all the money Plaintiff entrusted to your husband.

7 **Request for Admission No. 19:**

8 Admit that you were a partner in your husband's Ponzi scheme.

9 **Request for Admission No. 20:**

10 Admit that you are a partner in your husband's Ponzi scheme.

11 **Request for Admission No. 21:**

12 Admit that you have been a partner in your husband's Ponzi scheme.

13 **Request for Admission No. 22:**

14 Admit that you used Plaintiff's money to fund your lavish lifestyle?

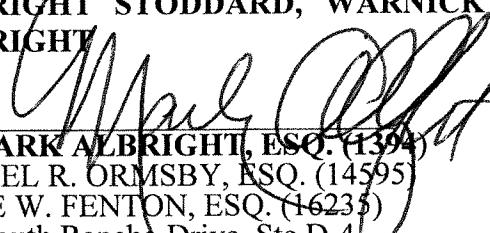
15 **Request for Admission No. 23:**

16 Admit that you formed the MJS Nevada Trust in order to prevent Plaintiff from recovering the  
17 money you and your husband cheated her out of?

18

19 DATED this 19<sup>th</sup> day of December, 2024.

20 **ALBRIGHT STODDARD, WARNICK &**  
21 **ALBRIGHT**

22 By: 

23 **G. MARK ALBRIGHT, ESQ. (1394)**

24 **DANIEL R. ORMSBY, ESQ. (14595)**

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**Appearing *pro hac vice***

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5 SONIA FELDMAN

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14 *kfenton@albrightstoddard.com*

15 **CERTIFICATE OF SERVICE**

16 I hereby certify that on the 19th day of December, 2024, a true and correct copy of the  
17 foregoing document was served via the Court's CM/ECF system on all parties currently on the  
18 electronic service list.

19 MARK SAWYER  
20 6940 N. Jensen Street  
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23 JENNIFER SAWYER  
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26 Email: [jen61002@hotmail.com](mailto:jen61002@hotmail.com)

27 NEVADA MJS TRUST  
28 6940 N. Jensen Street  
29 Las Vegas, NV 89149

30 MJS NEVADA TRUST  
31 6940 N. Jensen Street  
32 Las Vegas, NV 89149

33 THE PROPERTY LOCATED AT:  
34 508 Setting Moon Street  
35 North Las Vegas, NV 89084-1258

36 THE PROPERTY LOCATED AT:  
37 6508 Setting Moon Street  
38 North Las Vegas, NV 89084-1258

39 ATD COMMERCE, LLC  
40 C/o US CORPORATE SOLUTIONS, LLC  
41 2685 S. Rainbow Blvd., Suite 213

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2 ACM NORHT LLC.  
3 C/o US CORPORATE SOLUTIONS, LLC  
4 2685 S. Rainbow Blvd., Suite 213  
5 Las Vegas, NV 89146

6 MAS HOLDINGS GROUP, LLC  
7 US CORPORATE SOLUTIONS, LLC  
8 2685 S. Rainbow Blvd., Suite 213  
9 Las Vegas, NV 89146

10 SAWYER HOLDINGS, LLC  
11 C/o JEFFREY BURR, LTD.  
12 2600 Paseo Verde Pkwy., Suite 200  
13 Henderson, NV 89074

14 By: //s// Phyllis L. Cameron

15 Employee of Albright, Stoddard, Warnick & Albright

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